

**REMARKS**

This is in response to the Office Action dated September 10, 2003. Claim 7 has been canceled. Thus, claims 1-6 and 8-15 are now pending.

Applicant notes with appreciation the Examiner's allowance of claims 8, 9, 12 and 13. Applicant also notes with appreciation the Examiner's indication that claim 7 contains allowable subject matter.

The subject matter of allowable claim 7 has been added to claims 1 and 15. Thus, claims 1-6, 8-9 and 11-15 are now in condition for allowance.

Claim 10 is the only remaining claim that stands rejected.

Claim 10 stands rejected under 35 U.S.C. Section 103(a) as being allegedly unpatentable over Mitsui (US 5,408,345) in view of Kikuchi (JP 5-323336) and Ochi (JP 11-038389). This 3-way Section 103(a) rejection is respectfully traversed for at least the following reasons.

Claim 10 requires "an electrode pattern for adsorbing an ionic impurity is provided on the interlayer insulating film in the surrounding region on only one of the substrates, said pattern being coplanar with the pixel electrodes; the pair of substrates are arranged so that a rubbing direction of one of the substrates which is represented by a first arrow crosses a rubbing direction of the other one of the substrates which is represented by a second arrow, the first and second arrows each extending from its tail to its head; and the electrode pattern extends only along the entire length of one side of the display pixel area interposed between the head of the first arrow and the head of the second arrow." For

example, see Fig. 6 of the instant application which illustrates that the electrode pattern 150 for adsorbing an ionic impurity extends only along the entire length of one side of the display pixel area interposed between the head of the first rubbing direction arrow and the head of the second rubbing direction arrow.

Mitsui is entirely unrelated to the invention of claim 10. Recognizing this, the Office Action cites to Kikuchi and Ochi.

The alleged Section 103(a) combination of these three (3) references is incorrect and legally flawed. In particular, the teaching of Ochi which requires pattern coverage on one substrate around all 4 sides of the display panel is entirely non-analogous to the teaching of Kikuchi which requires pattern coverage on both substrates only proximate an LC pour hole. Ochi requires pattern coverage on a single substrate around all 4 sides of the display in order to reduce flicker. In contrast, Kikuchi uses pattern coverage on both substrates only proximate the LC pour hole in order to prevent uneven distribution of ionic impurities in the LC.

Thus, any possible combination of Kikuchi and Ochi (which applicant believes would be incorrect in any event) would result in Kikuchi's pattern on *both* substrates on the side proximate the pour hole, in addition to the other three sides as taught by Ochi. This structure is expressly excluded by claim 10 which requires that the pattern be on only one substrate. There is absolutely no disclosure or teaching in the cited art of an electrode pattern for adsorbing an ionic impurity located on only one of the two substrates and extending only along the entire length of one side of the display pixel area

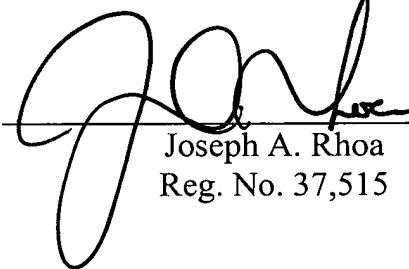
interposed between the two rubbing arrow heads as required by claim 10. Instead, Kikuchi teach directly away from this by requiring a pattern on *both* substrates proximate the LC pour hole in order to prevent uneven distribution of ionic impurities in the LC.

For at least the foregoing reasons, it is respectfully requested that all rejections be withdrawn. All claims are in condition for allowance. If any minor matter remains to be resolved, the Examiner is invited to telephone the undersigned with regard to the same.

Respectfully submitted,

**NIXON & VANDERHYTE P.C.**

By:



Joseph A. Rhoa  
Reg. No. 37,515

JAR:caj  
1100 North Glebe Road, 8th Floor  
Arlington, VA 22201-4714  
Telephone: (703) 816-4000  
Facsimile: (703) 816-4100